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District of Nevada

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6 Attorney for Plaintiff, United States of America

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

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9 UNITED STATES OF AMERICA, )

10 Plaintiff, )

11 vs. )

12 BRIAN WRIGHT, )

13 Defendant. )

Case No.: 2:14-cr-00357-APG-VCF

STIPULATION TO CONTINUE  
HEARING

(FIRST REQUEST)

15 IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS

16 A. TRUTANICH, United States Attorney; and CHRISTOPHER D. BAKER, Assistant

17 United States Attorney, counsel for the United States of America, and Angela Dows, counsel

18 for defendant BRIAN WRIGHT, that the hearing on defendant's motion for return of

19 property currently scheduled for March 31, 2020 at 10:00 a.m., be continued to a date on or

20 after June 1, 2020, or a date at the Court's convenience:

21 1. The parties appeared in Court on December 30, 2019, for a status conference and  
22 to address issues relating to defendant's pending motion for return of property.

23 2. At the status conference, the government represented that it intended to introduce  
24 some of the evidence defendant seeks to have returned – namely, approximately \$40,000 in cash

1 – at the trial of *United States of America v. Matthew Cannon*, then scheduled for February 24,  
2 2020. The Court indicated that the hearing on defendant’s motion for return of property should  
3 trail the trial of Cannon.

4 3. Following the status conference, the Court entered an order scheduling the hearing  
5 for March 31, 2020.

6 4. On January 29, 2020, the Hon. U.S. District Judge Richard F. Boulware ordered  
7 on stipulation the continuance of the trial of Cannon to April 20, 2020. *See* ECF No. 60 (2:19-  
8 CR-00025-RFB-VCF).

9 5. Accordingly, the parties stipulate that the ends of justice are best served by  
10 granting the continuance and rescheduling the hearing for a date on or after June 1, 2020, or  
11 a date at the Court’s convenience.

12 6. Counsel for defendant Wright represents that she has not communicated with  
13 Wright regarding this stipulation and does not know his views regarding the requested  
14 continuance. Accordingly, in the alternative, the government requests that the Court  
15 consider this stipulation a motion for continuance for the reasons set forth above.

16 DATED this 4<sup>th</sup> day of March, 2020.

17 NICHOLAS A. TRUTANICH  
18 United States Attorney

19 /s/  
CHRISTOPHER D. BAKER  
20 Assistant United States Attorney

21 /s/  
22 ANGELA H. DOWS  
23 Counsel for Defendant Brian Wright  
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Defendant.

## ORDER

## ORDER

DATED this 5th day of March, 2020.

  
UNITED STATES MAGISTRATE JUDGE

The U.S. Marshal is directed to transport Brian Wright to and from the hearing.